

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

IN RE APPLICATION:	§	DOCKET #: MANY-05
	§	
INVENTORS:	§	
Naomi F. Moneypenny and	§	
Steven D. Flinn	§	GROUP ART UNIT:
SERIAL NO:	§	2625
10/715,174	§	
FILED:	§	EXAMINER:
November 17, 2003	§	Stephen M. Brinich
TITLE:	§	
METHOD AND SYSTEM FOR	§	
CUSTOMIZED PRINT	§	
PUBLICATION AND	§	
MANAGEMENT	§	

**RESPONSE TO OFFICE ACTION OF 8/08/07**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Dear Sir:

Before considering the Remarks in response to the Office Action, please note the claim amendments at the end of this document. The independent claims have been substantially limited to clarify the distinction with the prior art cited in the office action.

**Substantive Response to 8/08/07 Office Action**

The applicants would like to thank the examiner for a thorough examination and for providing detailed explanations regarding the basis for rejections, and including a suggestion for how one of the claims could be brought into compliance with U.S.C. 101 (which applicants have done).

With regard to the examiner's U.S.C. 102 and 103 rejections, applicants acknowledge that Gupta et al seems to be the most relevant prior art to the applicants' invention.

With that acknowledgement and being mindful of the examiner's explanations for the rejections, the independent claims have been amended with additional limitations, supported by the specification, to distinguish the applicants' invention from Gupta et al., and to better clarify the non-obviousness of the applicants' invention in light of Gupta et al and other prior art.

Consistent with the amended claims, in summary, applicants' invention generates customized print media based on the following inputs:

1. Affinities among content objects, where the affinities are derived from usage patterns associated with the content objects
2. Affinities between print media customers and content objects based on the profiling of print media customers
3. Clusters of print media customers based on derived customer affinities
4. Print media parameters such as page size and page limits for each print media instance
5. Print media instance history

The applicants' invention then applies an algorithm to optimize the production of a plurality of print media instances based on these inputs. This process enables a truly automatic production of a plurality of optimized print media instances because all of the necessary information and functions are specified to do so.

Gupta et al. on the other hand, teaches a personalized print process utilizing input 2 above (customer profiles), but does not, for example, teach or suggest generating content-to-content affinities derived from usage patterns (input 1 above). Rather Gupta et al. teaches only a “classification” of content objects. It should be noted that classification of content objects provides significantly less information than specific affinities between content objects, particularly when the affinities are generated basis patterns of usage associated with the content objects.

Further, Gupta et al. does not teach or suggest generating clusters of print media customers (input 3 above). Nor does Gupta et al teach optimizing the production of print media instances by balancing multiple types of affinities with print media instance and constraining parameters.

Hence, one skilled in the art could not, in practice, apply the teachings of the Gupta et al invention to satisfactorily generate automatically a plurality of print media instances because insufficient information and functionality is specified in Gupta et al to do so. The Gupta et al invention could perhaps be applied to solve the problem of producing a personalized print media for a single individual, but even for that problem, without a rich set of affinities between content objects it is not clear how effective print media layouts could be automatically generated – the arbitrariness of possible formats would require either manual intervention or “random” formatting that would risk producing unacceptably low quality print media. And for multi-customer optimization applications, without customer clustering capabilities, an application based on the teachings of Gupta et al would be unable to do any real optimization to determine the specific different instances of print media that should be produced.

It is further respectfully submitted that the applicants' invention exhibits novelty and goes beyond just obvious extensions of Gupta et al for the following reasons:

- the automatic generation of content-to-content affinities based on usage patterns associated with the content is novel and provides significant additional utility and is not suggested by Gupta et al. nor any other known print media-related prior art.
- the clustering of print media customers derived from profiling information and historical usage patterns is not suggested or anticipated by Gupta et al nor other known print media-related prior art.
- the optimization of the production of a plurality of print media instances given the full set of available information and constraints associated with the applicants' invention yields results that are not necessarily predictable given the complexity of factors that are balanced. Such optimization is not suggested or anticipated by the prior art.

In summary, then, the features of the applicants' invention produces a fundamentally different result than the teachings of Gupta et al or any other combination of known prior art, and a result with significantly more practical application by one skilled in the art to the problem of producing customized print media.

The applicants trust that given this explanation and the submitted amended claims the examiner will find the application in order for allowance.

Please associate this file with our customer number **53928**.

Respectfully Submitted,

November 4, 2007  
Date

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